

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

TOTAL RX CARE, LLC

Plaintiff,

v.

GREAT NORTHERN INSURANCE
COMPANY

Defendant.

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CIVIL ACTION NO. 3:16-cv-2965

JURY DEMANDED

**GREAT NORTHERN INSURANCE COMPANY'S AMENDED
MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendant Great Northern Insurance Company ("Great Northern") respectfully moves the Court to dismiss for failure to state a claim Plaintiff Total RX Care, LLC's claims against Great Northern for fraudulent inducement, pattern and practice, promissory estoppel, and fraud and under the Deceptive Trade Practices Act.

Respectfully submitted:

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served on all counsel of record, listed below, via the Court's electronic filing system, on November 17, 2016.

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